

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IN RE:**

**GEORGIA CENTRAL UNIVERSITY,  
INC.,**

**Debtor.**

**BANK OF HOPE,**

**Movant,**

**v.**

**GEORGIA CENTRAL UNIVERSITY,  
INC.,**

**Respondent.**

**CHAPTER 11**

**CASE NO. 20-67718-bem**

**CONTESTED MATTER**

**GEORGIA CENTRAL UNIVERSITY, INC.'S WITNESS LIST  
AND LIST OF EXHIBITS FOR HEARINGS SCHEDULED FOR  
SEPTEMBER 24, 2020**

COMES NOW, Georgia Central University, Inc. (hereinafter "Debtor") and, pursuant to this Court's Case Management Procedures, files its Witness List, Exhibit List, and the attached Exhibits which it *may* introduce at Debtor's Confirmation Hearing and the continued hearings on Bank of Hope's Motion to Dismiss or, in the Alternative, for Relief from Stay and Debtor's Motion Requesting Entry of Order Authorizing the Use of Cash Collateral, which are scheduled to be held on September 24, 2020 at 10:00 a.m.

**Witness List**

Will call:

1. Dr. Paul Kim
2. Paul Hanna, Jones Lang Lasalle Brokerage, Inc.

May call:

1. Joy Song

**Exhibit List**

Following is Debtor's list of exhibits, copies of which are attached:

1. Debtor Exhibit 1: NOA Bank Deed to Secure Debt
2. Debtor Exhibit 2: Charlie and Aimee So Deed to Secure Debt
3. Debtor Exhibit 3: Paul Hanna, Jones Lang Lasalle Brokerage, Inc. Curriculum Vitae
4. Debtor Exhibit 4: Jones Lang Lasalle Brokerage Inc. Comparables
5. Debtor Exhibit 5: Exclusive Listing Agreement between Georgia Central University, Inc. and Jones, Lang Lasalle Brokerage, Inc.
6. Debtor Exhibit 6: Pro Coin Laundry Lease
7. Debtor Exhibit 7: S&S Brothers Lease
8. Debtor Exhibit 8: Royal Western Computer Lease
9. Debtor Exhibit 9: Redacted Student Registrations
10. Debtor Exhibit 10: Georgia Central University, Inc.'s Insurance Payment History
11. Debtor Exhibit 11: Georgia Central University, Inc.'s August and September Actual Budget (through September 17, 2020)
12. Debtor Exhibit 12: Georgia Central University, Inc.'s 2021-2025 Projected Budget
13. Debtor Exhibit 13: Georgia Central University, Inc.'s July 2020 Monthly Operating Report

14. Debtor Exhibit 14: Email exchange between Ryan C. Baker of Douglas Wilson

Companies and Ellis Kim of Bank of Hope

15. Debtor Exhibit 15: Georgia Central University, Inc.'s General Liability Binder

16. Debtor Exhibit 16: Georgia Central University, Inc.'s Property Insurance Binder

17. Debtor Exhibit 17: Property Tax History

Debtor also requests that the Court take judicial notice of all motions, orders, schedules, statements, pleadings, or other filings filed in the above-styled case. Debtor reserves the right to tender copies of such pleadings. Debtor reserves the right to supplement or amend this exhibit list. Debtor may use or offer into evidence any exhibit designated, used, or relied upon by any other party and any exhibits necessary for rebuttal or impeachment purposes.

Dated: September 17, 2020.

**JONES & WALDEN LLC**

/s/ Cameron M. McCord

Cameron M. McCord

Georgia Bar No. 143065

Aaron Anglin

Georgia Bar No. 585863

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**CERTIFICATE OF SERVICE**

This is to certify that on this day the foregoing *Georgia Central University, Inc.'s Witness List and List of Exhibits for Hearings Scheduled for September 24, 2020* ("Witness and Exhibit List") was electronically filed using the Bankruptcy Court's Electronic Case Filing program which sends a notice of and an accompanying link to the Witness and Exhibit List to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

- **Todd Eugene Hennings** thennings@maceywilensky.com
- **Office of the United States Trustee** ustpreion21.at.ecf@usdoj.gov
- **Nicholas J. Pieschel** njp@moormanpieschel.com, njpieschel@att.net
- **David S. Weidenbaum** david.s.weidenbaum@usdoj.gov

This 17<sup>th</sup> day of September, 2020.

**JONES & WALDEN LLC**

/s/ Cameron M. McCord

Cameron M. McCord

Georgia Bar No. 143065

699 Piedmont Avenue NE

Atlanta, GA 30308

Attorneys for Debtor

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